



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 2
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MEMORANDUM

DATE: September, 29, 1999

SUBJECT: National Remedy Review Board Recommendations –
Li Tungsten/Captain's Cove Superfund Site

FROM: John S. Frisco, Manager *JSF*
Superfund Remedial Program

TO: Bruce K. Means, Chair
National Remedy Review Board

I am writing in regard to the recommendations provided by the National Remedy Review Board involving the proposed remedy for the Li Tungsten Superfund site in Glen Cove, New York. The site includes the Li Tungsten industrial facility and the Captain's Cove property. The board's recommendations were provided in a memorandum, dated May 3, 1999.

The proposed remedy for the site includes the removal of radiological materials as well as soils and sediments contaminated with heavy metals. Efforts will be made to reduce the volume of radiologically-contaminated soil to decrease off-site disposal costs. In addition, the remedy includes no action other than monitoring for groundwater.

With regard to community advisory group comments, EPA has worked very closely with local officials and area residents involving its Superfund activities at the Li Tungsten site. The site was selected as a pilot for an early stakeholder involvement initiative and some actions have already been taken under the Superfund removal program. In addition, Glen Cove is the recipient of a Brownfields grant and the region has assigned a full-time employee to assist the community in its redevelopment efforts. Frequent meetings (about monthly) are held with community representatives and the Li Tungsten Task Force was provided with copies of the draft feasibility report for review and comment. Although the Task Force was informed of the region's meeting with the Remedy Review Board, it was not specifically asked to provide written comments for consideration by the board. The Task Force subsequently did provide comments on the draft FS and the potential remedial alternatives to the region through its TAG advisor and those comments were fully considered in the preparation of the proposed plan. This office appreciates the board's recognition of the region's outreach efforts at this site, and will continue these efforts in the future.

The region agrees with the board recommendation that, given the ongoing state-lead cleanups at neighboring contaminated sites, the cost-effective response actions for the Li Tungsten/Captain's Cove operable units depend heavily on careful coordination with the state. EPA is coordinating its actions with the New York State Department of Environmental Conservation to ensure consistency with regard to the remedial strategies for this site as well as other sites in the area. This coordination effort is particularly important for the cleanup work at Captain's Cove, a portion of which will be undertaken by the state. In March 1999, New York State signed a Record of Decision covering its work at Captain's Cove. EPA and the state have worked closely to ensure that the future land use assumptions and the resultant soil and groundwater cleanup objectives for the different portions of the site are consistent.

The board identified a number of concerns involving the proposed preliminary remediation goals for the site. In general, the board felt that the PRGs may be more conservative than necessary in view of the planned future commercial use of the property. The board also questioned whether use of the state's technical assistance guidance memoranda or TAGM levels based on the protection of groundwater supplies are appropriate given the location of the site and quality of the area groundwater.

The region has developed remedial action goals for inorganic and radiological contamination based on a site-specific risk assessment for the expected commercial use of the property. Although PCBs are also present in some areas of the site, they are co-located with inorganic and radiological contaminants that drive the cleanup. In addition, based on discussions with the state following receipt of the board's recommendations, no cleanup level for polycyclic aromatic hydrocarbons or PAHs has been specified as part of the remedy. With regard to the board's comment on the use of TAGM levels, the region agrees that such levels may be overly conservative considering the location of the site together with the fact that the underlying groundwater may not be potable. This issue has also been discussed with the state and the cleanup goals now primarily reflect the results of the region's risk assessment for the site.

The board's memorandum included a comment on a remedial alternative employing an electrokinetic treatment technology. Upon further investigation and consideration of this treatment technology, the region eliminated the alternative based on its unproven ability to treat the particular radionuclides of concern at the site. This finding is consistent with the board's comment on the potential limitations of the electrokinetic technology.

In response to the board's comment on groundwater, the region has clarified its strategy for addressing groundwater in the decision documents for the site. Briefly, the region believes that removal of the source material together with passive flushing of groundwater contaminants will cleanse the affected aquifer in a reasonable time frame. Active remediation is not considered necessary at the present time due to the sporadic and low-level nature of the contamination, the availability of public water to the affected area, and the current non-use quality of the aquifer as a potable water source. In addition, institutional controls in the form of a county public health

ordinance should effectively preclude any future well installations in the contaminated portion of the aquifer.

With regard to the board's comment on operation and maintenance costs, the region has adjusted upward the cost estimates associated with the groundwater alternatives to reflect activities not previously included in these estimates.

Lastly, the board recommended that the region more fully explain its rationale for not more fully considering alternatives involving on-site management or disposal of the waste.

The region has explained both in the proposed plan and ROD/Responsiveness Summary why it does not consider on-site disposal of the radiological contaminants to be an appropriate remedy for the Li Tungsten site. Unlike many types of chemical contaminants, radiological contaminants remain dangerous for very long periods of time. The half lives of the radionuclides of concern, i.e., radium and thorium, found at the Li Tungsten site range from thousands to more than a billion years. In addition, the site is in a populated area and overlies Long Island's sole source aquifer. As a result of the sole source aquifer designation, state law prohibits the siting of landfills in Nassau and Suffolk Counties on Long Island. Even if a landfill could be constructed on the site, perpetual maintenance and institutional controls would be necessary to ensure that the contained radiological materials do not pose a human health or environmental threat. The region is extremely concerned about the long-term effectiveness and reliability of such controls, especially in a populated area like Long Island. For many of these reasons, facilities licensed for the disposal of radiological wastes are located in remote areas of the country -- areas where people do not live and where groundwater is not used for potable purposes.

It should also be noted that the region has not selected on-site containment for any other sites in New York or New Jersey with radiological contamination. Rather, all have involved excavation and off-site disposal. The preferred remedy for the Li Tungsten site is consistent with regional decisions for other radiologically-contaminated sites.

Beyond the technical issues associated with siting a disposal facility in Glen Cove, public acceptance of such a facility is highly unlikely. In addition, an on-site landfill would inhibit reuse of the property. Although portions of the property could be redeveloped for some purposes, restrictions would have to be placed on other areas preventing development. Such restrictions are inconsistent with the development goals of EPA's Brownfields initiative and the designation of Glen Cove as a Brownfields showcase community.

For all of the above reasons, the region does not believe it is appropriate to consider on-site containment as an appropriate remedial alternative for the radiological contamination at the Li Tungsten site.

The region appreciates the advice and recommendations of the board in regard to the remedy for the Li Tungsten site.